

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA

NINA WILLIAMS, ) Case No.: 3:17-cv-00017  
vs. Plaintiff, )  
I.C. SYSTEM INC. ) COMPLAINT  
Defendant. )  
\_\_\_\_\_  
)

Plaintiff, Nina Williams, on behalf of herself (hereinafter "Plaintiff"), by and through her undersigned attorney, hereby sues Defendant, I.C. System Inc. (hereinafter "Defendant"), and alleges as follows.

**PRELIMINARY STATEMENT**

1. This is an action for damages arising from Defendant's violations of 47 U.S.C. §227 *et seq.*, the Telephone Consumer Protection Act ("TCPA").

**JURISDICTION AND VENUE**

2. This Court has jurisdiction over this action pursuant to 28 U.S.C. §1331.  
3. Venue is proper in this district under 28 U.S.C §1391(b).

**PARTIES**

4. Plaintiff is a natural person, who at all relevant times has resided in the City of Richmond, Virginia 23223.

5. Defendant is a corporation doing business in the State of Virginia with its principal place of business located at 444 East Highway 96, St. Paul, Minnesota 55127.

**FACTUAL STATEMENT**

6. On or about April 26, 2016, Plaintiff began receiving automated telephone calls from Defendant to her cellular telephone number.

7. On April 28, 2016, Plaintiff made an outbound call to Defendant, provided her telephone number to a representative of Defendant, and asked for all telephone calls to her to stop.

8. During the phone call on April 28, 2016, Plaintiff asked whether the telephone calls to her were being made through a dialing system and Defendant's representative confirmed that they were.

9. In spite of Plaintiff's request for the telephone calls to her stop, Defendant would continue to make automated telephone calls to Plaintiff in the coming weeks.

10. In total, Plaintiff received the fourteen additional automated calls from Defendant on the following dates in violation of the TCPA:

- a. May 5, 2016, 5:08 pm;
- b. May 6, 2016, 10:48 am;
- c. May 6, 2016, 6:34 pm;
- d. May 10, 2016, 6:13 pm;
- e. May 11, 2016, 3:13 pm;
- f. May 12, 2016, 1:28 pm;
- g. May 17, 2016, 4:53 pm;
- h. May 18, 2016, 2:48 pm;
- i. May 19, 2016, 4:17 pm;
- j. May 24, 2016, 7:37 pm;
- k. May 25, 2016, 11:15 am;
- l. May 26, 2016, 9:14 am;
- m. May 27, 2016, 11:27 am;
- n. May 28, 2016, 5:16 pm

11. The automated telephone calls were made from the phone numbers 307-316-7474 and 603-414-1944 which belongs to Defendant.
12. The automated telephone calls were placed to Plaintiff's cellular telephone number 804-xxx-2172.
13. Plaintiff revoked any consent that may have existed to call her during the course of the April 28, 2016 phone call.
14. All of Defendant's phone calls to Plaintiff were made through use of an automated telephone dialing system.

15. The repeated automated telephone calls to Plaintiff were a nuisance and an invasion of her privacy that caused her to lose the use of her phone during the time it was occupied by Defendant's incoming calls and waste time determining who was calling her and playing back voicemail messages.

**COUNT I**  
**VIOLATIONS OF THE TELEPHONE CONSUMER PROTECTION ACT**  
**47 U.S.C. § 227**

16. Plaintiff repeats the allegations contained in paragraphs 1 through 15 and incorporates them as if specifically set forth at length herein.
17. Plaintiff revoked any consent that Defendant may have had to call her cellular telephone number on April 28, 2016
18. Defendant placed fourteen automated telephone calls to Plaintiff's cellular telephone number through use of an automated telephone dialing system after Plaintiff revoked consent.

19. Defendant's actions constitute a violation of 47 U.S.C. §227(b)(1)(A)(iii), to which their falls no exemption to their behavior.

**JURY TRIAL DEMAND**

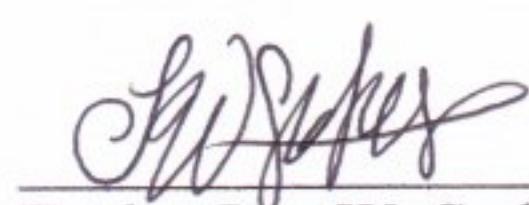
20. Plaintiff demands a jury trial on all issues so triable.

WHEREFORE, Plaintiff, Nina Williams, respectfully requests that this Court do the following for the benefit of Plaintiff:

- a. Enter an Order declaring Defendant's actions, as described above, in violation of the TCPA;
- b. Enter judgment against Defendant for all violations of 47 U.S.C. § 227b(1)(A)(iii)
- c. Enter judgment against Defendant for statutory damages for each violation of 47 U.S.C. § 227b(1)(A)(iii) or treble damages of the Court deems the violations willful; and
- d. Grant such other and further relief as may be just and proper.

Dated this 23rd Day of December 2016:

Respectfully Submitted,



---

Taylor-Lee W. Stokes  
Taylor-Lee W. Stokes, P.C.  
6933 Commons Plaza, Suite 101  
Chesterfield, VA 23832  
Telephone: 804-318-0653  
Email: [twstokes@attorneysstokes.com](mailto:twstokes@attorneysstokes.com)

Of Counsel to the Firm:  
Law Offices of Michael Lupolover P.C.  
120 Sylvan Avenue, Suite 300  
Englewood Cliffs, NJ 07632  
Telephone: 201-461-0059  
Facsimile: 201-608-7116